

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**IN RE: ANGENITA SMITH  
DEBTOR**

**CHAPTER 13  
CASE NO. 21-01696 JAW**

**NS193, LLC, BY STATEBRIDGE  
COMPANY, LLC, SERVICING AGENT**

**MOVANT**

**VS.**

**ANGENITA SMITH, DEBTOR**

**RESPONDENT**

**ANSWER TO MOTION FOR  
RELIEF FROM STAY AND FOR OTHER RELIEF**

COMES NOW, Debtor, **ANGENITA SMITH**, by and through counsel and files this, her Response to NS193, LLC, by Statebridge Company, LLC, Servicing Agent's Motion For Relief From Automatic Stay and to Abandon Property in support thereof would show unto this Honorable Court, the following things, to-wit:

1.

That the Debtor denies the averments contained in paragraph one of the Motion.

2.

That the Debtor admits the averments contained in paragraph two of the Motion.

3.

That the Debtor admits the averments contained in paragraph three of the Motion.

4.

That the Debtor denies the averments contained in paragraph four of the Motion.

5.

That the Debtor denies the averments contained in paragraph five of the Motion.

6.

That the Debtor denies the averments contained in paragraph six of the Motion.

7.

That the Debtor denies the averments contained in paragraph seven of the Motion.

8.

That the Debtor admits the averments contained in paragraph eight of the Motion.

9.

That the Debtor denies the averments contained in paragraph nine of the Motion.

10.

That the Debtor denies the averments contained in paragraph ten of the Motion.

11.

That the Debtor denies the averments contained in paragraph eleven of the Motion.

12.

That the Debtor denies the averments contained in paragraph twelve of the Motion.

That the Debtor denies each and every averment of the Motion neither admitted or denied above, including the Motion's last unnumbered paragraph beginning with the word "WHEREFORE",

**WHEREFORE, PREMISES CONSIDERED**, the debtor, respectfully state that NS193, LLC, by Statebridge Company, LLC, Servicing Agent is not entitled to any relief whatsoever by this court, and now having fully answered, the debtor requests this Honorable Court to deny the relief requested by the Movant.

Respectfully submitted,

BY: /s/ THANDI WADE  
THANDI WADE

THANDI WADE, MSB #10464

TATUM & WADE

POST OFFICE BOX 22688

JACKSON, MS 39225-2688

(601)948-7770

email: [twade42@aol.com](mailto:twade42@aol.com) or [bankruptcy@tatumandwade.com](mailto:bankruptcy@tatumandwade.com)

**CERTIFICATE OF SERVICE**

I, THANDI WADE, do hereby certify that I have on this day delivered electronic mail a true and correct copy of the above and foregoing Answer to Motion to the following persons:

Via email: [Ustpreigion05.ja.ecf@usdoj.gov](mailto:Ustpreigion05.ja.ecf@usdoj.gov)  
Office of the U.S. Trustee  
501 E. Court Street  
Suite 6.430  
Jackson, MS 39201

Via email [jlhenley@jlhenleych13.net](mailto:jlhenley@jlhenleych13.net)  
and ECF/CMF Electronic Notice  
Hon. James L. Henley, Jr.  
Chapter 13 Trustee  
P. O. Box 31980  
Jackson, Mississippi 39286-1980

Via email [Karen.Maxcy@mccalla.com](mailto:Karen.Maxcy@mccalla.com)  
and ECF/CMF Electronic Notice  
Karen A. Maxcy  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076

Angenita Smith  
6547 Goldfield Street North  
Las Vegas, NV 89084

DATED: This the 1<sup>st</sup> day of March, 2023.

/s/ THANDI WADE  
\_\_\_\_\_  
THANDI WADE